

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
Style Stitch, Inc. :
Plaintiff,
-Against- : Case No.: 23-cv-10701-MKV
The Avyan Group, LLC :
Defendant. :
----- X

DECLARATION OF SUMEER KAKAR

SUMEER KAKAR, pursuant to 28 USC § 1746, declares as follows:

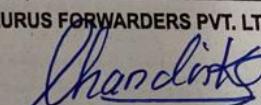
1. I am an attorney at Kakar, P.C. and make this Declaration upon my personal knowledge and in opposition to Defendant's second motion to dismiss this action for a lack of personal jurisdiction.
2. In opposition of the Defendant's pending motion, I reviewed information and documents provided by the Plaintiff concerning its business activities with the Defendant, that are relevant and related to the claims set forth in the Second Amended Complaint ("SAC").
3. A true and correct copy of a bill of lading ("BOL") for the commercial trade between the parties is attached hereto as **Exhibit A**.
4. The attached BOL under **Exhibit A** demonstrates that the Plaintiff shipped to the Defendant, as consignee, apparel products, that were discharged at the port of New York, with the assistance of a delivery agent based out of New York City.
5. I declare under the penalty of perjury that the foregoing is true and correct.

New York, New York
November 19, 2024



Sumeer Kakar

EXHIBIT "A"

MTD BILL OF LADING		EXPRESS RELEASE	
Consignor / Shipper STYLE STITCH INC PLOT NO.374 UDYOG VIHAR SECTOR 37 PHASE VI, GURGAON 122001 HARYANA,INDIA		MTD NO. SHIPMENT REF. NO: <div style="text-align: center; margin-top: 10px;">  TAURUS FORWARDERS PVT. LTD. 508-510, 5th Floor, Srishti Plaza, Saki Vihar Road, Behind Amar Tara Plastics, Powai, Mumbai - 400 072. Tel. : +91 022 4043 1000 REGN. NO. MTO/DGS/396/SEP/2025 FMC NO.025382 E-mail : raman@taurusforwarders.com Web Site : www.taurusforwardersindia.com </div>	
Consignee (or order) THE AVYAN GROUP LLC 5 CAMBRIDGE WAY PRINCETON JUNCTION NJ 08550 USA TEL:+ 1 201 245 5120			
Notify address THE AVYAN GROUP LLC 5 CAMBRIDGE WAY PRINCETON JUNCTION NJ 08550 USA TEL:+ 1 201 245 5120			
Place of acceptance & Date CMAMCGM IVANHOE V-3108	Port of Loading NHAVA SHEVA (INDIA)		
Port of discharge NEW YORK,USA	Place of Delivery NEW YORK,USA		
Vessel & Voyage No. CMAMCGM IVANHOE V-3108		Modes / Means of transport	Route/Place of Transhipment (if any)
Container No. (s) CONTAINER NO CMAU-6521931 A.SEAL NO C6078350		Gross Weight Kgs. GRS WT.KGS 7711.700 Measurement CBM 1X40HQ FCL/FCL	
Marks and numbers PKG NOS 1 TO 851		Number, kinds of packages/ description of goods. 851 PKGS (EIGHT HUNDRED AND FIFTY ONE PKGS ONLY) 100% COTTON LADIES WOVEN SOLID S/S/LV SHIRT H.S.CODE NO.62063090 S/BILL NO.8010823 DTD.23.02.2023 INV NO.SSI/120/22-23 DTD.18.02.2023 PO#900064 STYLE #LR1011,LR1012 & LR1014	
"FREIGHT COLLECT"		NET WT.KGS 6640.520 SHIPPED ON BOARD DTD.28.02.2023	
DESTINATION PORT CHARGES, ON ACCOUNT OF CONSIGNEE			
SHIPPER'S LOAD,STOW, COUNT AND WEIGHT			
Particulars above furnished by consignor / consignee EXPRESS RELEASE			
Delivery Agent : ORIENTAL AIR TRANSPORT SERVICE INC. 175-41, 148TH ROAD, JAMAICA, NY 11434 USA TEL: 718-632-0390 FAX: 718-632-0597 EMAIL: Bibi.jfk@orientalair.com	Freight Amount	Number of Original MTD(s)	Place and date of issue
	Freight payable at DESTINATION	For TAURUS FORWARDERS PVT. LTD. <div style="text-align: right; margin-top: 10px;">  Chandrika AUTHORISED SIGNATORY </div>	
Weight and measurement of container not to be included (TERMS CONTINUED ON BACK HEREOF)		Signature for and on behalf of TAURUS FORWARDERS PVT. LTD.	